

REMEDIAL ACTION CERTIFICATION FORM

Lennar Mare Island – Investigation Area D1.2

1. **Certification of Remedial or Removal Action:**

I hereby certify that the following information is true and correct to the best of my knowledge.

1. [Signature] 4/17/06
Project Manager, Site Mitigation Date

2. [Signature] 4/17/06
Unit Chief Date

3. [Signature] 4-21-06
Branch Chief Date

2. **Certification Statement:** Based upon the information which is currently and actually known to the Department, the Department has determined that all appropriate response actions have been completed, that all necessary institutional controls were implemented, and that no further removal/remedial action is necessary.

3. **Site Name and Location:**

Lennar Mare Island
Investigation Area D1.2
Solano County
Vallejo, CA 94592

A. List any other names that have been used to identify this site:

Lennar Mare Island Investigation Area D1.2

B. Address of site if different from above:

Lennar Mare Island
690 Walnut Avenue, Suite 100
Vallejo, California 94592

C. Assessor's Parcel Number: Portions of APN 066-050-050 (APN number will change as property is developed)

4. Parties of Interest

a. Responsible Party

Name: United States Navy
Southwest Division
Naval Facilities Engineering Command

Relationship to site: Former Owner

b. Cleanup Contractor

Firm: Lennar Mare Island
Name: Sheila Roebuck
Title: Project Director
Address: 690 Walnut Avenue, Suite 100, Mare Island, Vallejo, CA
94592
Telephone: (707) 557-8223

Relationship to site: Land Owner/Developer

5. Brief Description and History of the Site:

IA D1.2 is the eastern portion of IA D1 which is located in the central and southern areas of Lennar Mare Island property and is subject to the Consent Agreement. It occupies 113.64 acres of the entire 231 acres of IA D1. Past uses of this area included the military housing and barracks, community service and recreational facilities, offices, garages, and storage/service buildings. According to the City of Vallejo's Preliminary Land Use Plan, IA D1.2 is planned for residential and educational uses.

The following areas at IA D1.2 have been identified and evaluated with regard to environmental issues:

Installation Restoration (IR) Site 14 Pipeline in IA D1: LMI inspected and cleaned the pipeline to remove residual solids to comply with the requirements of the RCRA. DTSC had identified the industrial wastewater pipeline as an interim status unit under RCRA because it is an appurtenance to the Industrial Wastewater Treatment Plant. In order to satisfy RCRA requirements, the pipeline within IA D1.2 was inspected on April 30, 2004 to determine if waste remained in place. The inspection revealed that the pipeline was intact and in good condition. No breaks were observed; however, solids were found intermittently in the pipeline. In June 2004, a composite sample of the solids was collected from three manhole locations. No volatile organic compounds or semivolatile organic compounds were detected; however, metals and polychlorinated biphenyls were detected. On July 20, 2004, the IR14 pipeline segments in IA D1.2 were flushed of residual solids and the pipeline was inspected again by video survey to confirm that all solids had been removed. No solids were observed in the final video inspection, confirming that no residual waste remains inside the pipeline. During the flushing, rinseate water and solid material were collected for disposal evaluation. The analytical result for the rinseate water met the City of Vallejo Sanitation Flood Control District criteria and was discharged to the sanitary sewer on August 23, 2004.

Lead-based Paint (LBP) in Soil: In March and April 2004, soil sampling was conducted at 110 buildings located within IA D1.2 to characterize the concentration of lead in soil from LBP. Soil samples were collected from the exposed soil areas around buildings, both along the drip line and in the mid-yard area, and analyzed for lead. DTSC approved risk-based cleanup goals for residential use of 210 mg/kg for a building site-wide average concentration in conjunction with an upper limit on each individual sample concentration of 400 mg/kg. For non-residential areas, the acceptable building site-wide average concentration was established at 750 mg/kg with all individual sample concentrations required to be below 1,000 mg/kg. In comparing the analytical results from the soil sampling to the cleanup goals at the 110 buildings in IA D1.2, 89 buildings required excavation of lead-impacted soil. CH2M HILL performed soil removal at 64 of the 89 structures in October and November 2004, and January through April 2005. ENTACT performed soil removal at the remaining 25 structures in June through August 2005. Following the soil excavation, verification sample results indicate that remaining lead concentrations in soil at the 89 buildings within IA D1.2 are below the cleanup goals based on the proposed land use. The IA D1.2 Implementation Report documented the necessary remedial actions and results. For those sites where cleanup achieved the non-residential goals, Land Use Covenants will be implemented to restrict use.

Petroleum sites: Thirteen underground storage tanks (UST) and 20 segments of the Fuel Oil Pipeline (FOPL) within IA D1.2 were identified, investigated and cleaned up based on the proposed land use in accordance with Regional Water Quality Control Board (RWQCB) Order R2-2002-0105. Requests for no further action for each UST and FOPL segment have been submitted by LMI and approved by the RWQCB and DTSC.

Polychlorinated biphenyl (PCB) Sites: Thirty four PCB sites within IA D1.2 were identified and evaluated. DTSC and the United States Environmental Protection Agency (USEPA) have approved the closure of 19 PCB sites for unrestricted use. These 19 PCB sites were remediated to at or below 0.22 mg/kg in soil as established by USEPA as the residential preliminary remedial goal (PRG).

Fifteen PCB sites required remedial activities which included soil and concrete removal, encapsulation, and the recordation of land use covenants (LUCs). PCB-specific LUCs have been entered into by LMI and DTSC, and designate the USEPA as a third-party beneficiary. USEPA will have enforcement authority with respect to the restrictions related to the PCB-specific LUCs. The LUCs prohibit future use of the property for sensitive uses with provisions for enforcement and are recorded with the County of Solano.

Encapsulation and recordation of LUCs are required for four PCB sites. Two of these sites have elevated concentrations of PCBs underneath active transformers and two sites have floors encapsulated through application of two coats of epoxy paint in accordance with the provisions of Toxic Substances Control Act (TSCA). The remaining PCB sites requiring LUCs have PCBs in concrete, wood or asphalt surfaces. In addition to management provisions specific to the condition of the sites and the measures used to prevent exposure, the LUCs require that if the use of the property changes in a manner that increases the risk of exposure to PCBs, an evaluation of the feasibility of implementing remedial measures that at least reduce increased exposure risks from PCBs is required to be approved by DTSC and USEPA.

Land-use Covenants: In addition to the PCB sites that require LUCs, the presence of lead-based paint in soil and petroleum sites make it necessary, as part of the remedy, to institute a regional LUC that prohibits sensitive uses. The LUC prohibits the following uses: residential, schools for persons under 18 years, hospitals, and day-care centers. An Operations and Maintenance Plan for IA D1.2 sets the requirements for proper management of the areas where LUCs are instituted. It also provides for management of PCB sites, soil containing constituents at concentrations that exceed those appropriate for unrestricted use, as well as requirements for periodic reporting, enforcement of restrictions, and reimbursement of DTSC costs associated with the administration of the restrictions.

The Remedial Action Plan (RAP) for IA D1 was prepared, circulated for a 30-day public review from April 22, 2004 through May 21, 2004, and discussed at a public meeting held on April 29, 2004. DTSC approved the final IA D1 RAP on May 27, 2004. A California Environmental Quality Act (CEQA) Negative Declaration was concurrently prepared, circulated for 30 days, and signed on May 27, 2004. A notice to terminate RCRA Corrective Action for IA D1.2 was also circulated for a 45-day public review from October 31, 2005 through December 15, 2005. A letter of certification and termination of RCRA Corrective Action for Investigation Area D1.2 was signed on April 11, 2006.

6. **Type of Site:** (Check appropriate response)

Included in CalSites?

☒ Yes ☐ No

RCRA-Permitted Facility

☒

Bond - Funded

☐

RCRA Regulated Unit Closures

☐

RP - Funded

☐

*NPL

☐

Federal Facility

☒*

Other (i.e., walk-in):

Explain Briefly: *Former Federal Facility

7. **Size of Site:**

Small ☐ Medium ☒ Large ☐ Extra Large

8. **Dates of Remedial or Removal Action**

A. Initiated: April 1993

B. Completed: December 2005

9. **Response Action Taken on Site:** (check appropriate action)

☒ Removal Action (satisfactory abatement of site)

☒ Final Remedial Action

☐ RCRA enforcement/closure action

☒ RCRA Corrective Action

☐ No action, further investigation verified that no cleanup action at site was needed.

A. Type of Remedial or Removal Action (e.g. excavation and redisposal, cap, on-site treatment?):

Excavation of contaminated soil, encapsulation of PCB contaminated concreted, land use covenant institutional controls for areas remediated to less than unrestricted levels.

B. Estimated quantity of waste associated with the site (i.e., tons/gallons/cubic yards) which was:

- | | | |
|------------------|--------------------------|------------------------------------|
| 1. <u> </u> | treated | Amount: |
| 2. <u> </u> | untreated (capped sites) | Amount: |
| 3. <u> X </u> | removed | Amount: <u>100,000 cubic yards</u> |

10. **Cleanup Levels/Standards**

A. What were the cleanup standards established by DTSC pursuant to the final remedial action plan or removal action workplan?

Lead 210mg/kg (unrestricted use cleanup level), 750mg/kg (industrial use)
PCB 0.22mg/kg (unrestricted use cleanup level), 0.74 mg/kg (industrial use)
TPH 400 mg/kg (unrestricted use cleanup level)
TPH(gasoline) 500 mg/kg (industrial use cleanup level)
TPH(diesel) 1000 mg/kg (industrial use cleanup level)
TPH (motor oil) 2000 mg/kg (industrial use cleanup level)

B. Were the specified cleanup standards met? Yes No X

C. If "no", why not:

There are two PCB sites with active transformers that are above the cleanup goals and are encapsulated. LUCs are in place to ensure that any contamination will be cleanup once the transformers are no longer active.

11. **DTSC Involvement in the Remedial or Removal Action:**

A. Did the Department enter into an Enforcement Agreement?

Yes X No Date of Order FFSRA 1993 (revised 2002) with Navy; Consent Agreement 2001 with Lennar Mare Island

B. Did the Department review and approve the following plans/procedures? (Indicate date of review/approval if done):

Abatement/Deconstruction Project

Sampling and Analysis Procedures	Date: <u>April 2004</u>
Health & Safety Procedures	Date: <u>April 2004</u>
Removal/Disposal Procedures	Date: <u>April 2004</u>
Removal Action Workplan	Date: <u>April 2004</u>

Sitewide

Final D1 RAP

Date: May 27, 2004

- C. If site was abated by a responsible party, did the Department receive a signed statement from a licensed professional on all phases of the Remedial Actions? (indicate date of statement)

Investigation Area D1 RAP

Date: April 2004

- D. Did a registered engineer or geologist verify that acceptable engineering practices were implemented?

Yes X No Name: Jeffery Morris Date: April 2004

- E. Did the Department confirm completion of all Remedial Actions?

Yes X No Date of verification: December 2005

- F. Did the Department (directly or through a contractor) actually perform the Remedial Action?

Yes No X Name of Contractor:

- G. Was there a community relations plan in place? Yes X No

- H. Was a remedial action plan or removal action workplan developed for this site?

Yes X No

- I. Did DTSC hold a public meeting regarding the draft RAP or RAW?

Yes X No April 29, 2004

- J. Were public comments addressed?

Yes X No Date of DTSC analysis and response:
May 27, 2004 (in the final RAP).

- K. Are all of the facts cited above adequately document in the DTSC files?

Yes X No

If no, identify the areas where documentation is lacking

12. EPA Involvement in the Remedial or Removal Action:

A. Was the EPA involved in the site cleanup? Yes X No

USEPA provided technical guidance on removal actions related to PCB sites.

B. If yes, did EPA concur with all removal actions? Yes X No

EPA staff involved in cleanup: Carolyn d'Almeida
75 Hawthorne Street
San Francisco, CA 94105

13. **Other Regulatory Agency Involvement in the Cleanup Action:**

Agency: Activity:

 X RWQCB Review and approve SAP, RAP and TPH abatement

 ARB

 CHP

 Caltrans

 X Other Department of Fish and Game reviewed ecological risk issues

Name of contact persons and agency: Gina Kathuria , SF Bay Regional Water Quality Control Board

14. **Post-Closure Activities:**

A. Will there be post-closure activities at this site? (e.g. Operation and Maintenance)

Yes X No

If yes, describe: Land Use Conveant and Implementation and Enforcement Plan

B. Have post-closure plans been prepared and approved by the Department?

Yes X No

C. What is the estimated duration of post-closure (including operations and maintenance) activities? 30 + years.

D. Are deed restrictions proposed or in place? Yes X No _____

If "yes" have deed restrictions been recorded with the County Recorder?
Yes X No _____ Date: March 2006

If "no", who is responsible for assuring that the deed restrictions are recorded?

Who is the Division Contact?

Anthony Landis, OMF Branch Chief

E. Has cost recovery been initiated? Yes X No _____

All costs incurred up to May 1, 2001 were paid out of DSMOA. All costs incurred from May 2001 through March 2002 were paid either from DSMOA or through cost recovery per the Consent Agreement. After March 2002 all costs incurred were and will be paid per the Consent Agreement. The site owner is billed on a quarterly basis per Consent Agreement.

F. Were local planning agencies notified of the cleanup action?
Yes X No _____ If yes, the name and address of agency: City of Vallejo
555 Santa Clara Street, Vallejo, California 94590